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19 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

JOINT DISCOVERY STATUS REPORT

20 THIS DOCUMENT RELATES TO:

21 || ALL ACTIONS

Pursuant to the Court's April 1, 2013 Case Management Order (Dkt. 380), the parties submit this joint discovery status report.

26 I. Status of Discovery

27 No depositions have taken place since the April 26, 2013 Joint Discovery Status Report.
28 The deposition of Sheryl Sandberg (formerly of Google) remains outstanding.

1 **II. Salary Range and/or Market Reference Guideline**

2 The parties report the following updates to last week's Joint Discovery Status Report:

3 **Apple:** Plaintiffs and Apple met and conferred further and reached a resolution regarding
 4 Plaintiffs' request that Apple confirm the accuracy of tables of Apple job title and job grade data
 5 that Plaintiffs have prepared. There are no outstanding issues or discovery disputes to be decided
 6 with respect to Apple's production of compensation information.

7 **Intel:** Plaintiffs and Intel met and conferred further and reached a resolution regarding
 8 Plaintiffs' request that Intel confirm the accuracy of tables of Intel job title and job grade data that
 9 Plaintiffs have prepared. There are no outstanding issues or discovery disputes to be decided with
 10 respect to Apple's production of compensation information.

11 **Lucasfilm:** Lucasfilm compiled and produced to Plaintiffs certain information Plaintiffs
 12 had requested as contemplated in last week's discovery report. Subject to Lucasfilm's
 13 representation about how it maintained its salary range information during the Class Period,
 14 Plaintiffs are satisfied and there are no outstanding issues or discovery disputes to be decided with
 15 respect to Lucasfilm's production of compensation information.

16 **III. Steve Jobs Apple Town Hall Materials**

17 At Plaintiffs' request, Apple has located and produced video recordings of the Apple town
 18 hall meetings for which it previously produced transcripts. There are no outstanding issues or
 19 discovery disputes to be decided with respect to this request.

20 **IV. Plaintiffs' Responses To Interrogatories 15 & 16**

21 The parties have met and conferred and have agreed that Plaintiffs will supplement their
 22 response to Defendants' Interrogatory No. 15 no later than May 24, 2013, and will provide a
 23 substantive response to Defendants' Interrogatory No. 16 no later than June 7, 2013.

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1 Respectfully submitted,

2 Dated: May 3, 2013 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

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8 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
9 the filing of this document has been obtained from all signatories.

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